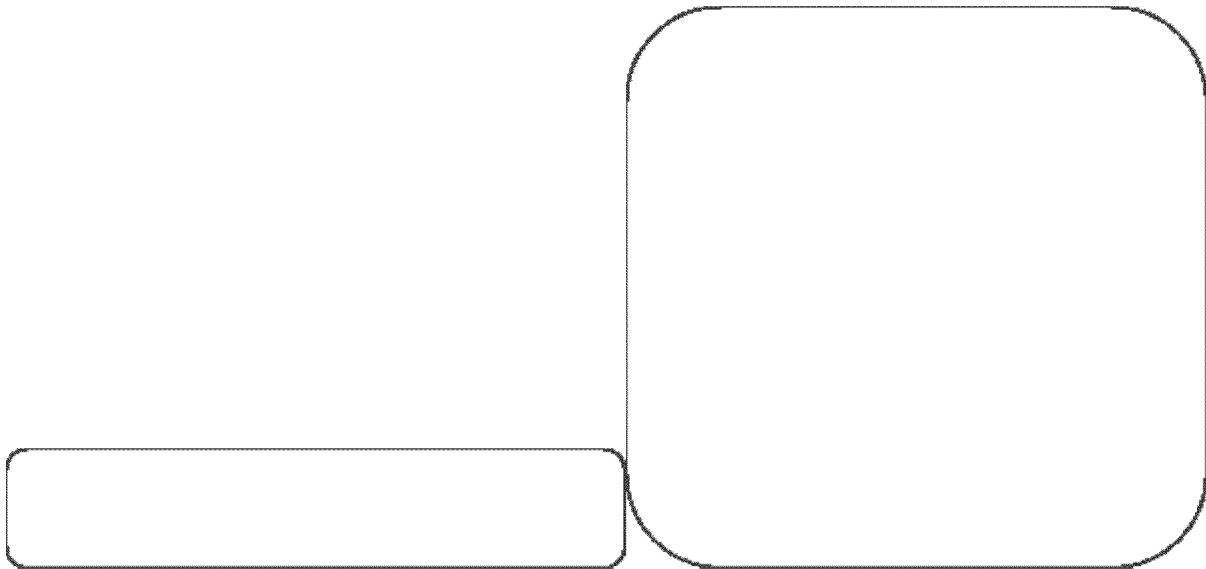


To: Christenson, Kara[Christenson.Kara@epa.gov]; Steckel, Andrew[Steckel.Andrew@epa.gov]
Cc: Alkon, Margaret[Alkon.Margaret@epa.gov]
From: LEVIN, NANCY
Sent: Tue 10/4/2016 8:44:00 PM
Subject: RE: ARS 49-457 -- Ag BMP Committee

OK. Will not talk to ADEQ about the matters regarding enforcement. However, for question 1 below, ADEQ's intent is that Rule 611 (approved Oct 2011) is still part of the SIP, and that, assuming we approved 611 (submitted Dec 21, 2015), there would be two rules numbered R18-2-611. They would have different titles. To support this, see page 15 of the Pinal main submittal document. Does this suffice?



Rule or Statute Added	Overarching Arizona Administrative Register or Legislative Citation	SIP Rule(s) Replaced (Federal Register Citation)
<p>A.A.C., Title 18, Chapter 2, Article 2.</p> <p><u>Sections</u> R18-2-210. Ambient Air Quality Standards; Area Designations; Classifications</p> <p>A.A.C. Title 18, Chapter 2, Article 6. Emissions from Existing and New Nonpoint Sources</p> <p><u>Sections</u> R18-2-610. Definitions for R18-2-610.01, R18-2-610.02, and R18-2-610.03 ... R18-2-610.03. Agricultural PM General Permit for Crop Operations; Pinal County PM Nonattainment Area</p> <p>R18-2-611. Definitions for R18-2-611.01, R18-2-611.02, and R18-2-611.03 ... R18-2-611.03. Agricultural PM General Permit for Animal Operations; Pinal County PM Nonattainment Area</p> <p>R18-2-612. Definitions for Definitions for R18-2-612.01 ... R18-2-612.01. Agricultural PM General Permit For Irrigation Districts; PM Nonattainment Areas Designated After June 1, 2009 ... Appendix 2. Test Methods And Protocols</p> <p>(Other rules were included in this rulemaking, but ADEQ intends to submit them in a subsequent revision)</p>	<p>Notice of Final Exempt Rulemaking, 21 A.A.R. 1156, July 24, 2015 (effective July 2, 2015).</p>	<p>A.A.C. R18-2-210 (2012) Attainment, Nonattainment, and Unclassifiable Area Designations (79 FR 56655, Sept. 23, 2014)</p> <p>ADEQ is not requesting rule replacement of any of the A.A.C. Title 18, Chapter 2, Article 6 agricultural rules at this time. ADEQ is only requesting additions, currently. ADEQ will request any replacements in a subsequent SIP revision submittal.</p>

From: Christenson, Kara
Sent: Tuesday, October 04, 2016 1:06 PM
To: LEVIN, NANCY <Levin.Nancy@epa.gov>; Steckel, Andrew <Steckel.Andrew@epa.gov>
Cc: Alkon, Margaret <Alkon.Margaret@epa.gov>
Subject: RE: ARS 49-457 -- Ag BMP Committee

Ex. 5 & 7

From: LEVIN, NANCY
Sent: Tuesday, October 04, 2016 12:13 PM
To: Christenson, Kara <Christenson.Kara@epa.gov>; Steckel, Andrew <Steckel.Andrew@epa.gov>
Subject: RE: ARS 49-457 -- Ag BMP Committee

Thanks for reviewing. You're correct - the AgBMP rules do not apply to these Hickman facilities because they only regulate facilities in NAA.

Here are the questions I'll look into:

Ex. 5 - Deliberative Process

Let me know if there is something else to look into.

Nancy Levin | 415-972-3848 | Rules and Planning

Air Division | Region IX| U.S. Environmental Protection Agency

From: Christenson, Kara

Sent: Tuesday, October 04, 2016 11:19 AM

To: Steckel, Andrew <Steckel.Andrew@epa.gov>; LEVIN, NANCY <Levin.Nancy@epa.gov>

Subject: RE: ARS 49-457 -- Ag BMP Committee

Ex. 5 & 7

From: Steckel, Andrew

Sent: Tuesday, October 04, 2016 8:40 AM

To: Christenson, Kara <Christenson.Kara@epa.gov>; LEVIN, NANCY <Levin.Nancy@epa.gov>

Subject: RE: ARS 49-457 -- Ag BMP Committee

Nancy – Would you try to figure out if there are any existing Maricopa permit or prohibitory rules that apply to ag?

From: Christenson, Kara

Sent: Sunday, October 02, 2016 4:21 PM

To: LEVIN, NANCY <Levin.Nancy@epa.gov>

Cc: Steckel, Andrew <Steckel.Andrew@epa.gov>

Subject: ARS 49-457 -- Ag BMP Committee

Ex. 5 & 7

I made some edits to the ARS 49-457 TSD on the Sharepoint. Nothing major except this potential relaxation issue.